

FAR 145 Repair Station Rating System Review Survey

PURPOSE: The Aviation Rulemaking Advisory Committee (ARAC) was tasked by FAA to recommend a system to rate aeronautical repair stations that mitigates problems associated with the existing system of ratings and accommodates the growth of the aviation industry. The purpose of this survey is to collect information regarding **YOUR** understanding and ideas on the current Part 145 ratings.

INSTRUCTIONS: The current Part 145 rating system is outlined in the table below. Please provide **your** perspective on the scope, usefulness, and issues associated with each rating. Only complete those sections with which you have experience or familiarity. Do not submit more than one survey.

Aviation Affiliation (e.g., FAA, Repair Station, Maintenance Technician, Customer): National Air Transportation Association (Compiled Results)

Name and Contact Information (optional): Eric Byer, ebyer@nata-online.org

Rating	Scope What do you think are the privileges and limitations of this rating?	Usefulness Is this rating necessary? (Yes/No) Please explain.	Issues State any issues that you have experienced with the rating.
AIRFRAME			
Airframe Class 1: Composite Construction Small Aircraft	-Repair, alter, and/or inspect any aircraft 12500 pds or less, that is of composite construction. Also repair, alter, and/or inspect any parts thereof installed or to be installed on the aircraft to be released as part of the aircraft. (release aircraft, not individual part). - For all aircraft under 12,500 lbs. gross weight that are not all metal, that the Repair Station has manuals, trained people, and required tooling for that will fit into your facility.	-No, no one has all requirements for all airframes. We therefore have always been required to ensure we have the housing, equip, personnel, etc. to perform any work. Since this is our responsibility and the limitation as to our qualification is determined by us, the rating is meaningless. - Yes, it is a group of aircraft that can be worked on that are the same in scope but you do not have to list each one by make and model.	-No aircraft is all composite construction and we have never been able to get a clear determination as to what constitutes "composite construction". We can repair a component (example: wheel assy.) and install it and release the aircraft, but cannot release the wheel assy as a component. This serves no purpose and we must sub out component work or get additional ratings for work we are otherwise qualified to perform.
Airframe Class 2: Composite Construction Large Aircraft	-Repair, alter, and/or inspect any aircraft over 12500 pds, that is of composite construction. Also repair, alter, and/or inspect any parts thereof installed or to be installed on the aircraft to be released as part of the aircraft. (release aircraft, not individual part).		
Airframe Class 3: All-metal Construction Small Aircraft	-Repair, alter, and/or inspect any aircraft 12500 pds or less, that is of all metal construction. Also repair, alter, and/or inspect any parts thereof installed or to be installed on the aircraft to be released as part of the aircraft. (release aircraft, not individual part). - For all aircraft under 12,500 lbs. gross weight that are all metal, that the Repair Station has manuals, trained people, and required tooling for that will fit into your facility.	-Yes, it is a group of aircraft that can be worked on that are the same in scope but you do not have to list each one by make and model.	-Many aircraft are not "all metal construction", yet are accepted under this rating. This will get more complicated with newer aircraft that are made up of composite structures and other structures of metal construction. Clear definition is required if the rating system is to be continued. We can repair a component (example: wheel assy.) and install it and release

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			the aircraft, but cannot release the wheel assy as a component. This serves no purpose and we must sub out component work or get additional ratings for work we are otherwise qualified to perform.
Airframe Class 4: All-metal Construction	<p>-Authority to work on any aircraft 12,500# max certificated take off weight of all metal construction provided the housing, personnel, tools & equipment and tech data requirements are met.</p> <p>-Repair, alter, and/or inspect any aircraft over 12500 pds, that is of all metal construction. Also repair, alter, and/or inspect any parts thereof installed or to be installed on the aircraft to be released as part of the aircraft. (release aircraft, not individual part).</p>	<p>-No. There are no Repair Stations that work on every 'all metal' aircraft over 12,500#. FAA usually requires a capability list (by aircraft make and model) anyway.</p>	<p>-FAA inspectors inspect the Repair Station in terms of being able to work on all aircraft in the class.</p> <p>- Many aircraft are not "all metal construction", yet are accepted under this rating. This will get more complicated with newer aircraft that are made up of composite structures and other structures of metal construction. Clear definition is required if the rating system is to be continued.</p> <p>We can repair a component (example: wheel assy.) and install it and release the aircraft, but cannot release the wheel assy as a component. This serves no purpose and we must sub out component work or get additional ratings for work we are otherwise qualified to perform.</p>
Limited: Airframes of a particular make and model	<p>-To work on a particular make and model</p> <p>-Authority to work on any aircraft listed on the Repair Station Ops Specs. Housing, personnel, tools & equipment and tech data requirements still apply.</p> <p>-Repair, alter, and/or inspect any aircraft over 12500 pds, that is listed on the R/S OPS Specs. Also repair, alter, and/or inspect any parts thereof installed or to be installed on the aircraft to be released as part of the aircraft. (release aircraft, not individual part).</p> <p>-For all aircraft that the Repair Station has manuals, trained people, and required tooling for, that will fit into your facility</p>	<p>-Yes, Works great for us because we are very airframe specific by choice which minimizes equipment investments</p> <p>-Yes. A business operating under the authority of FAR 145 should be able to decide what constitutes the make up of that business.</p> <p>-Although the aircraft for which we are rated our now defined, we must still ensure that we have the housing, equip, personnel, etc. to perform any work. Since this is our responsibility and the limitation as to our qualification is determined by us, the rating is meaningless.</p> <p>-Yes, it is a group of aircraft that can be worked on that, as a repair station, you have the manuals, trained personnel, and required</p>	<p>-This system works very well with the scope of the service center network we operate.</p> <p>- We can repair a component (example: wheel assy.) and install it and release the aircraft, but cannot release the wheel assy as a component. This serves no purpose and we must sub out component work or get additional ratings for work we are otherwise qualified to perform.</p> <p>- Yes, some FSDO's want each make and models listed instead of make and model series by Type Certificate</p>

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		tooling required to perform maintenance on listed each one by make and model.	
POWERPLANT			
Powerplant Class 1: Reciprocating engines of 400 HP or less	-Repair, alter, inspect and/or overhaul all engines and any part thereof including components/accessories supplied with the engine (recip 400 HP or less), installed or to be installed on the engine to be released as part of the engine. (release engine, not individual part).	-No, no one has all requirements for all engines. We therefore have always been required to ensure we have the housing, equip, personnel, etc. to perform any work. Since this is our responsibility and the limitation as to our qualification is determined by us, the rating is meaningless.	-We can repair a component (example: magneto.) and install it and release the engine, but cannot release the magneto as a component. This serves no purpose and we must sub out component work or get additional ratings for work we are otherwise qualified to perform.
Powerplant Class 2: Reciprocating engines of more than 400 HP	-Repair, alter, inspect and/or overhaul all engines and any part thereof including components/accessories supplied with the engine (recip 400 HP or less), installed or to be installed on the engine to be released as part of the engine. (release engine, not individual part).	Same as above	Same as above
Powerplant Class 3: Turbine Engines	-Repair, alter, inspect and/or overhaul turbine engines and any part thereof including components/accessories supplied with the engine, installed or to be installed on the engine to be released as part of the engine. (release engine, not individual part).	Same as above	Same as above
Limited: Engines of a particular make and model	-Authority to work only on engines installed on the airplanes for which the Repair Station is rated and listed on the Repair Station Ops Specs. -Repair, alter, inspect and/or overhaul engines as listed on OPS Specs, and any part thereof including components/accessories supplied with the engine, installed or to be installed on the engine to be released as part of the engine. (release engine, not individual part). -For all engines that the Repair Station has manuals, trained people, and required tooling for, that will fit into your facility.	-Yes. This rating provides for the scope of the work authorized to be carried out on the engine. It provides the level to which a Repair Station may provide maintenance. -Although the engine for which we are rated our now defined, we must still ensure that we have the housing, equip, personnel, etc. to perform any work. Since this is our responsibility and the limitation as to our qualification is determined by us, the rating is meaningless. -Yes, it is a group of engines that can be worked on that, as a repair station, you have the manuals, trained personnel, and required tooling required to perform maintenance on listed each one by make and model.	-Although restrictive in some cases, this rating provides for the exact privileges and limitations a Repair Station needs in order to define its capabilities. -Yes, some FSDO's want each make and models listed instead of make and model series by Type Certificate.
PROPELLER			
Propeller Class 1: All fixed pitch& ground adjustable propellers of wood, metal, or composite construction			

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	What do you think are the privileges and limitations of this rating?	Is this rating necessary? (Yes/No) Please explain.	State any issues that you have experienced with the rating.
Propeller Class 2: All other propellers, by make	-For all propellers by manufacturer that the Repair Station has manuals, trained people, and required tooling for that will fit into your facility such as Hartzell and McCaulley.	-Yes, it is a group of propellers that can be worked on that are the same in scope but you do not have to list each one by model.	
Limited: Propellers of a particular make and model	-For all propellers that the Repair Station has manuals, trained people, and required tooling for, that will fit into your facility.	-Yes, it is a group of propellers that can be worked on that, as a repair station, you have the manuals, trained personnel, and required tooling required to perform maintenance on listed each one by make and model.	-Yes, some FSDO's want each make and models listed instead of make and model series by Type Certificate.
RADIO			
Radio Class 1: Communication Equipment	<p>-To work on any Comm as long as you have the data, required test equipment and training (specific or by similarity) for that product</p> <p>-Authority to work on all equipment defined by this class</p> <p>-Repair, alter, inspect and/or overhaul components as listed by regulation (not clear, see issues), and any part thereof and release components as rated.</p> <p>-For all communication equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.</p>	<p>-One can never tell what aircraft may have what installed. The class rating allows us to meet the customers requirements.</p> <p>- No. There are no Repair Stations that work on all equipment in this class. FAA usually requires a capability list (by make and model) anyway.</p> <p>- No, no one has all requirements for all class 1 radio. We therefore have always been required to ensure we have the housing, equip, personnel, etc. to perform any work. Since this is our responsibility and the <u>limitation</u> as to our qualification is determined by us, the rating is meaningless.</p> <p>- Yes, it is a group of communication equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.</p>	<p>-FAA inspectors inspect the Repair Station in terms of being able to work on all equipment in the class.</p> <p>- Many components are multi functional (nav/com, etc.) and therefore require more than one rating.</p> <p>-Although FAR 145 Appendix A lists that the rating allows for many inspections/checks etc. of the airframe system that the equipment is installed in, many FSDOs require the aircraft to be listed in the OPS Specs, or at least a statement that the component can be installed and tested. I agree that Appendix A should be eliminated, but additional confusion will be created if the rating is not clearly defined.</p> <p>- Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating. Some FSDO's require a limited airframe rating instead of requiring qualified personnel. An applicant should not be required to meet all the Limited Airframe requirements to simply install a Communication radio upgrade. A licensed airframe mechanic on staff with structural experience should be sufficient.</p>
Radio Class 2: Navigational equipment	<p>-Authority to work on all equipment defined by this class</p> <p>-For all navigational equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.</p>	<p>-No. There are no Repair Stations that work on all equipment in this class. FAA usually requires a capability list (by make and model) anyway.</p>	<p>-FAA inspectors inspect the Repair Station in terms of being able to work on all equipment in the class.</p> <p>-Yes, the question of what is a</p>

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		-Yes, it is a group of navigational equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	substantial amount of the class can be a problem on whether or not to allow the rating.
Radio Class 3: Radar equipment	-Authority to work on all equipment defined by this class -For radar equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	-No. There are no Repair Stations that work on all equipment in this class. FAA usually requires a capability list (by make and model) anyway. -Yes, it is a group of radar equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	-FAA inspectors inspect the Repair Station in terms of being able to work on all equipment in the class. -Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.
Limited: Radio equipment of a particular make and model	-Authority to work on any radio equipment listed on the Repair Station Ops Specs. Housing, personnel, tools & equipment and tech data requirements still apply. - Not needed if you have a class rating for what you work on.	-Yes. A business operating under the authority of FAR 145 should be able to decide what constitutes the make up of that business. - Yes, it is a group of radio equipment that can be worked on that, as a repair station, you have the manuals, trained personnel, and required tooling required to perform	-Yes, some FSDO's want each make and models listed instead of make and model series
INSTRUMENT			
Instrument Class 1: Mechanical	-To work on any Instrument as long as you have the data, required test equipment and training (specific or by similarity) for that product -Authority to work on all instruments defined by this class -For all mechanical equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	-One can never tell what aircraft may have what installed. The class rating allows us to meet the customers requirements. - No. There are no Repair Stations that work on all equipment in this class. FAA usually requires a capability list (by make and model) anyway. -Yes, it is a group of mechanical equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	-FAA inspectors inspect the Repair Station in terms of being able to work on all instruments in the class. - Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.
Instrument Class 2: Electrical	-Authority to work on all instruments defined by this class -For all electrical equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	-No. There are no Repair Stations that work on all equipment in this class. FAA usually requires a capability list (by make and model) anyway. -Yes, it is a group of electrical equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	-FAA inspectors inspect the Repair Station in terms of being able to work on all instruments in the class. -Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.
Instrument Class 3:	-Authority to work on all instruments defined by this class	-No. There are no Repair Stations that work	-FAA inspectors inspect the Repair

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Gyroscopic	-For all gyroscopic equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	on all equipment in this class. FAA usually requires a capability list (by make and model) anyway. -Yes, it is a group of gyroscopic equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	Station in terms of being able to work on all instruments in the class. -Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.
Instrument Class 4: Electronic	-Authority to work on all instruments defined by this class -For all electronic equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	-No. There are no Repair Stations that work on all equipment in this class. FAA usually requires a capability list (by make and model) anyway. -Yes, it is a group of electronic equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	-FAA inspectors inspect the Repair Station in terms of being able to work on all instruments in the class. -Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.
Limited: Instruments of a particular make and model	-Authority to work on any instruments listed on the Repair Station Ops Specs. Housing, personnel, tools & equipment and tech data requirements still apply.	-Yes. A business operating under the authority of FAR 145 should be able to decide what constitutes the make up of that business. -Yes, it is a group of instrument equipment that can be worked on that, as a repair station, you have the manuals, trained personnel, and required tooling required to perform maintenance on listed each one by make and model if you don't work on a sufficient amount to receive a class rating.	-Yes, some FSDO's want each make and models listed instead of make and model series.
ACCESSORY			
Accessory Class 1: Mechanical	-To work on any Accessory as long as you have the data, required test equipment and training (specific or by similarity) for that product -Authority to work on all accessories defined by this class -For all mechanical equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	-One can never tell what aircraft may have what installed. The class rating allows us to meet the customers requirements. - No. There are no Repair Stations that work on all accessories in this class. FAA usually requires a capability list (by make and model) anyway. - Yes, it is a group of mechanical equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.	-FAA inspectors inspect the Repair Station in terms of being able to work on all accessories in the class. -Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.
Accessory Class 2: Electrical	-Authority to work on all accessories defined by this class -For all electrical equipment that the Repair Station has manuals, trained people, and required tooling when they can work on a large portion of the class.	-No. There are no Repair Stations that work on all accessories in this class. -FAA usually requires a capability list (by make and model) anyway.	-FAA inspectors inspect the Repair Station in terms of being able to work on all accessories in the class. - Yes, the question of what is a

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		<p>-Yes, it is a group of electrical equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.</p>	substantial amount of the class can be a problem on whether or not to allow the rating.
Accessory Class 3: Electronic	<p>-Authority to work on all accessories defined by this class</p> <p>-For all electronic equipment that the Repair Station has manuals, trained people, and required tooling for that when they can work on a large portion of the class.</p>	<p>-No. There are no Repair Stations that work on all accessories in this class.</p> <p>-FAA usually requires a capability list (by make and model) anyway.</p> <p>-Yes, it is a group of electronic equipment that can be worked on that are the same in scope but you do not have to list each one by make and model.</p>	<p>-FAA inspectors inspect the Repair Station in terms of being able to work on all accessories in the class.</p> <p>-Yes, the question of what is a substantial amount of the class can be a problem on whether or not to allow the rating.</p>
Limited: Accessories of a particular make and model	-Authority to work on any accessories listed on the Repair Station accessory capability list. Housing, personnel, tools & equipment and tech data requirements still apply.	<p>-Yes for a manufacture of a particular product only</p> <p>-Yes. A business operating under the authority of FAR 145 should be able to decide what constitutes the make up of that business.</p> <p>-Yes, it is a group of accessory equipment that can be worked on that, as a repair station, you have the manuals, trained personnel, and required tooling required to perform maintenance on listed each one by make and model if you don't work on a sufficient amount to receive a class rating.</p>	-Yes, some FSDO's want each make and models listed instead of make and model series.
LIMITED (other than those listed above)			
Limited Landing Gear Components		<p>-Yes, it is a group of accessory equipment that can be worked on that, as a repair station, you have the manuals, trained personnel, and required tooling required to perform maintenance on listed each one by make and model if you don't work on a sufficient amount to receive a class rating.</p>	-This applies to all limited ratings below. There is considerable variation in the way components are listed from FSDO to FSDO. Some by description, i.e., landing gear strut. Some by make and model. Some by finite part number including dash number. This makes it hard to compete with, audit, etc.
Limited Floats, by make			
Limited Nondestructive inspection, testing and processing	<p>-Authority to perform NDI services for aviation customers. The service is not limited to NDI functions on an aircraft under the control of the Repair Station. Subject to housing, personnel, tools & equipment and tech data requirements</p> <p>-For all NDT work that the Repair Station has manuals, trained people, and required tooling per discipline</p>	<p>-Yes. A business operating under the authority of FAR 145 should be able to decide what constitutes the make up of that business.</p> <p>-Yes, when you have the expertise and training to perform these functions because they do not fit the class or limited rating</p>	<p>-This rating accommodates the desire of a business to specialize in certain areas of expertise.</p> <p>- Yes, some FSDO's want to force limited airframe ratings on this rating as well. This usually makes it so expensive that they just don't become certified and</p>

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		system.	perform this as a mechanic or IA. If you have a NDT level certification, you do not need an airframe rating to fix the entire aircraft!
Limited Emergency Equipment	-For all emergency equipment that the Repair Station has manuals, trained people, and required tooling.	-Yes, because these items do not fit into an accessory class rating and you have the manuals, trained personnel, and required tooling to perform this work.	-Yes, some FSDO's want each make and models listed instead of make and model series.
Limited Rotor blades, by make and model			
Limited Aircraft fabric work			
Limited: Any other purpose as determined by the Administrator	-Authority to perform services for aviation customers for any purpose for which the company may be in business and that requires an Air Agency Certificate	-Yes. A business operating under the authority of FAR 145 should be able to decide what constitutes the make up of that business.	-The FAA could require a FAA approved process specification depending on the privilege being requested. It conflicts with the Specialized Service rating.
Limited specialized service	-Authority to perform a specialized service in accordance with a FAA approved process specification. -For all processes that are FAA Approved outside of the above class or limited ratings that the Repair Station has manuals, trained people, and required tooling.	-No. This rating could be combined in the Limited Rating concept -When you have the trained personnel, manuals or processes, and required tooling to perform processes that do not fall under other ratings. This is very important for small-specialized repair stations that do not qualify for other ratings.	-Some FSDOs believe that a R/S with this rating cannot approve a component for which it is rated to perform a specific task on, for return to service. They should be able to approve it for return to service for the work performed. If they are not rated to release the article then there is no reason for a rating. - Yes, some FSDO's want to force limited airframe ratings on this rating as well. This usually makes it so expensive that they just don't become certified and perform this as a mechanic or IA. If you have an acceptable process, you do not need an airframe rating to fix the entire aircraft!

Rating System Review Survey

The purpose of this document is to collect information regarding **YOUR** understanding and ideas on the current Part 145 ratings.
Please complete only those sections with which you have experience or familiarity. **Do not submit more than one survey.**

Aviation Affiliation (e.g., FAA, Repair Station, Repair Station Customer, Maintenance Technician):

Name and Contact Information (optional): Rose Scoones, rosita.m.scoones@boeing.com

Rating	Perspective What do you think are the privileges and limitations of this rating?	Usefulness Is this rating necessary? (Yes/No) Why or why not?	Issues State any issues that you have experienced with the rating.
Airframe Class 1: Composite Construction Small Aircraft	<p>Privileges: May perform maintenance and alterations of airframes [airframe – fuselage, booms, nacelles, cowlings, fairings, airfoil surfaces (including rotors but excluding propellers and rotating airfoils of engines) and landing gear of an aircraft and their accessories and controls.] 12,500 Lbs (maximum certificated takeoff weight, MTOW) or less that are primarily constructed of composite materials.</p> <p>Approve for return to service any article for which it is rated after it has been maintained or altered.</p> <p>Perform 100-hour, annual or progressive inspections, and return the aircraft to service.</p> <p>Maintain or alter any article for which it is rated at a place other than the repair station in accordance with FAR 145.51 (d), (1) (2) (3).</p> <p>Limitations All Ratings: May not maintain or alter any article for which it is rated if it requires special technical data, equipment, or facilities that are not available to it.</p> <p>May not approve for return to service any aircraft, airframe after major repair or major alteration unless the work was done in accordance with technical data approved by the Administrator.</p>	No. The requirement for a Repair Station is to have the tools, equipment, facilities, data, and personnel available to perform the task. If you are not set up for Composite Repair then you could not perform the task anyway.	<p>Not sure what composite is or isn't. What portion of airplane content has to be composite before it is considered a composite airplane?</p> <p>All commercial aircraft produced are a combination of composite and metal materials. One rating for aircraft is sufficient.</p> <p>We do not agree with the rating breakdown at 12500 Lbs. Example: a DC-3 is classed as a large aircraft, but is not anywhere nearly as complicated a design (structures or systems) as a Learjet.</p> <p>Differentiation might be for Rotorcraft / Fixed Wing as they are entirely different in concept and requirements.</p> <p>Summary: The rating systems should be based on capabilities not weight or construction.</p>
Airframe Class 2: Composite Construction Large Aircraft	<p>Privilege: May perform maintenance and alterations of airframes, over 12,500 Lbs (MTOW) that are primarily constructed of composite materials.</p> <p>Approve for return to service any article for which it is rated after it has been maintained or altered.</p> <p>Perform 100-hour, annual or progressive inspections, and return the aircraft to service.</p> <p>Maintain or alter any article for which it is rated at a place other than the repair station in accordance with FAR 145.51 (d), (1) (2) (3).</p>	Same comment as for Class 1 above.	Same comment as for Class 1 above.